

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Jamal Spurlock,	:	
	:	
Plaintiff,	:	Case No. 3:21-cv-01074-JRK
	:	
v.	:	Judge James R. Knepp II
	:	
Palletsource, Inc., <i>et al.</i> ,	:	
	:	
	:	
Defendants.	:	

**DEFENDANT SURGE STAFFING, LLC’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO COMPLAINT**

Defendant Surge Staffing, LLC (“Surge Staffing” or “Defendant”) respectfully moves the Court for a twenty-one (21) day extension of its deadline to respond to Plaintiff’s Complaint—that is, until July 16, 2021—in order to fully analyze, investigate, address, and respond to the issues set forth in the Complaint. No other extensions have been requested or granted. Counsel for Defendant has conferred with counsel for Plaintiff who has indicated that Plaintiff does not oppose the requested extension. A memorandum in support of this motion is attached hereto.

Respectfully Submitted,

/s/ Jolene S. Griffith

Gary S. Batke (0030329)
John F. Marsh (0065345)
Jolene S. Griffith (0084940)
BAILEY CAVALIERI LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
Telephone: (614) 221-3155
Fax: (614) 221-0479
gbatke@baileycav.com
jmarsh@baileycav.com
jgriffith@baileycav.com

Attorneys for Defendant Surge Staffing, LLC

MEMORANDUM IN SUPPORT

Defendant Surge Staffing, LLC (“Surge Staffing” or “Defendant”) respectfully moves the Court for a twenty-one (21) day extension of its deadline to respond to Plaintiff’s Complaint. Defendant’s current deadline to respond to the Complaint is June 25, 2021. Defendant seeks a brief extension of its deadline to respond to the Complaint—that is, until July 16, 2021—in order to fully analyze, investigate, address, and respond to the issues set forth in the Complaint. No other extensions have been requested or granted. Counsel for Defendant has conferred with counsel for Plaintiff who has indicated that Plaintiff does not oppose the requested extension. As such, Defendant respectfully requests that the Court extend its deadline to respond to the Complaint until July 16, 2021.

Respectfully Submitted,

/s/ Jolene S. Griffith

Gary S. Batke (0030329)

John F. Marsh (0065345)

Jolene S. Griffith (0084940)

BAILEY CAVALIERI LLC

10 West Broad Street, Suite 2100

Columbus, Ohio 43215

Telephone: (614) 221-3155

Fax: (614) 221-0479

gbatke@baileycav.com

jmarsh@baileycav.com

jgriffith@baileycav.com

Attorneys for Defendant Surge Staffing, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was e-filed and served upon the following via the Court's electronic filing system and via email this 24th day of June 2021.

Fred M. Bean
Taurean J. Shattuck
David E. Byrnes
The Spitz Law Firm, LLC
Water Tower Plaza
25200 Chagrin Blvd., Suite 200
Beachwood, Ohio 44122
Fred.Bean@spitzlawfirm.com
Taurean.Shattuck@spitzlawfirm.com
David.Byrnes@spitzlawfirm.com
Attorney for Plaintiffs

/s/ Jolene S. Griffith

Jolene S. Griffith (0084940)